



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

7272 Cleanwater Lane • PO Box 47775 • Olympia, Washington 98504-7775 • (206) 753-2353

February 18, 1994

Daniel L. Goodell
Jones-Goodell Corporation
1690 Marine View Drive
Tacoma, WA 98422-4130

Dear Mr. Goodell:

Re: General NPDES Permit No. WAG-03-1019, Reconnaissance Inspection, Jones-Goodell Corp.

On January 28, 1994, I conducted the above-referenced inspection. The purpose of the inspection was to review actions that Jones-Goodell were taking to correct the deficiencies noted in our October 28, 1993, Class I Compliance Inspection. A copy of my inspection report is enclosed for your information.

As noted in the conclusions, Jones-Goodell shall continue to work with the Tacoma Sewer Utility to receive authorization to discharge effluent from your oil/water separator to the sanitary sewer. However, if the City does not issue you authorization to discharge to the sanitary sewer, you must notify Ecology by telephone within 24 hours. A written addendum to the existing engineering report which discuss additional treatment shall be required to be submitted to Ecology within 30 days of the time the City of Tacoma denies your application.

Please review the conclusions. If you have any questions please call me at (206) 586-6240.

Also, I would like to take this time to tell you that I have accepted a new position and my last day with Ecology will be February 28, 1994. Joyce Mercuri will be resuming my job responsibilities for the boatyard permits within the Commencement Bay Super Fund areas. Joyce Mercuri's telephone number is (206) 586-4692.

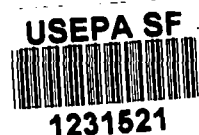
Thank you and Harold Hahn for the time that was spent in completing this inspection.

Sincerely,

Sandra Stephens
Compliance Inspector
Toxics Cleanup Program
Southwest Regional Office

SS:dc
Enclosure

cc: Troy Naccarato, Tacoma Sewer Utility
Karen Keeley, EPA
Dave Knight, Ecology, SWRO
Joyce Mercuri, Ecology, SWRO
Dave Smith, Ecology, SWRO
Cindy James, Ecology, SWRO





United States Environmental Protection Agency
Washington, D.C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Facility Type
1 <u>N</u> 2 <u>5</u> 3 <u>W</u> <u>A</u> <u>G</u> <u>O</u> <u>3</u> <u>1</u> <u>0</u> <u>1</u> <u>9</u> 11 12 <u>9</u> <u>4</u> <u>0</u> <u>1</u> <u>2</u> <u>8</u> 17 18 <u>R</u> 19 <u>S</u> 20 <u>2</u>					
Remarks					
21 _____ 66					
Reserved		Facility Evaluation Rating	BI	QA	Reserved
67 <u> </u> <u> </u> <u> </u> 69	70 <u> </u>	71 <u> </u>	72 <u> </u>	73 <u> </u> <u> </u> <u> </u> 74	75 <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> 80

Section B: Facility Data

Name and Location of Facility Inspected JONES-GODELL CORP 1690 MARINE VIEW DRIVE TACOMA, WA 98422-4130	Entry Time <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM 9:15	Permit Effective Date
	Exit Time/Date 10:22 01/28/94	Permit Expiration Date 11/04/97
Name(s) of On-Site Representative(s) DANIEL L. GODELL HAROLD HAHN	Title(s) GENERAL MANAGER SUPERINTENDENT	Phone No(s)
Name, Address of Responsible Official	Title	
	Phone No.	Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N/A	Flow Measurement	S3	Pretreatment	S	Operations & Maintenance
S1	Records/Reports	N/A	Laboratory	N	Compliance Schedules	N/A	Sludge Disposal
M2	Facility Site Review	N	Effluent/Receiving Waters	N	Self-Monitoring Program	M4	Other:

Section D: Summary Of Findings/Comments (Attach additional sheets if necessary)

- Spill control and solid waste plans are in place. However, employees must be trained about those plans and be expected to perform in accordance with these practices.
- Blasting shed needs to be upgraded or dismantled. Spent grit should be piled and covered with plastic sheeting to prevent contact with storm water. This would be a temporary measure until the permittee can afford to properly dispose of the material.
- The permittee continues to work with the Tacoma Sewer Utility to receive authorization to discharge their oil/water separator effluent (pressure wash water). Is the City denies the permittee application to discharge, an addendum to the existing engineering report which discusses additional treatment is required.
- Storm water outfall pipe appears to be no longer functioning. This means that the pathway of greatest concern is water flowing through soil rather than over land. Ecology may want to investigate seeps along the waterfront.

For More Information See Attached Inspection Report

☐ Announced
☒ Unannounced

Name(s) and Signature(s) of Inspector(s) Sandra Stephens	Agency/Office/Telephone Ecology/SWRO/TCP/586-6240	Date
Lee Bagley	Ecology/SWRO/HWTR/753-6375	
Signature of Reviewer	Agency/Office	Date

Regulatory Office Use Only

Action Taken	Date	Compliance Status <input type="checkbox"/> Noncompliance <input type="checkbox"/> Compliance
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INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error if the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number. (*Use the Remarks columns to record the State permit number, if necessary.*)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 82/06/30 = June 30, 1982).

Column 18: Inspection Type. Use one of the codes listed below to describe the type of inspection:

A - Performance Audit	E - Corps of Engrs Inspection	S - Compliance Sampling
B - Biomonitoring	L - Enforcement Case Support	X - Toxic Sampling
C - Compliance Evaluation	P - Pretreatment	
D - Diagnostic	R - Reconnaissance Inspection	

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

C - Contractor or Other Inspectors (<i>Specify in Remarks Column</i>)	R - EPA Regional Inspector
E - Corps of Engineers	S - State Inspector
J - Joint EPA/State Inspectors - EPA lead	T - Joint State/EPA Inspectors-State lead
N - NEIC Inspectors	

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 - Municipal. Publicly Owned Treatment Works (POTWs) with 1972 Standard Industrial Code (SIC) 4952.
- 2 - Industrial. Other than municipal, agricultural, and federal facilities.
- 3 - Agricultural. Facilities classified with 1972 SIC 0111 to 0971.
- 4 - Federal. Facilities identified as federal by the EPA Regional Office.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as follow-up on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory.

Section C: Areas Evaluated During Inspection

Indicate findings (S, M, U, or N) in the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection. The heading marked "Other" may include activities such as SPCC, BMPs, and multimedia concerns.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.



INSPECTION REPORT

Date of Visit: January 28, 1994

Inspectors: Lee Bagley, Solid & Hazardous Waste Program
Sandra Stephens, Toxics Cleanup Program

Name of Entity: Jones-Goodell Corporation

Persons Contacted: Daniel L. Goodell, General Manager
Harold Hahn, Superintendent

Permit Number: General Boatyard NPDES Permit No. WAG-03-1019

Permit Expires: November 4, 1997

City: Tacoma

County: Pierce

Type of Facility: Boatyard

Receiving Water: Hylebos Waterway
Inner Commencement Bay

Type of Treatment System: Stormwater - Best Management Practices (BMPs) are to be implemented by 5/26/94.

Pressure Washing - discharge to sanitary.

COMMENTS

This was an unannounced NPDES Permit Reconnaissance Inspection. The purpose of the inspection is to review actions that Jones-Goodell are taking to correct the deficiencies noted in our October 28, 1993, Class I Compliance Inspection. Conducting the inspection was Sandra Stephens from the Southwest Regional Office, Toxics Cleanup Program, Urban Bay Action Team (UBAT). Lee Bagley, from Ecology's Solid and Hazardous Waste Program accompanied me on the inspection.

We arrived at the facility at approximately 9:15 a.m., on January 28, 1994, and left at 10:22 a.m. The weather was clear and sunny. Dan Goodell, General Manager, and Harold Hahn, Superintendent for Jones-Goodell Corporation, met us in the front office. We reviewed some of the permit paperwork and toured the yard. Dan Goodell and Harold Hahn provided the tour and information.

In the office we reviewed NPDES General Boatyard requirements for the Jones-Goodell facility. The spill control and solid waste control plans were in place. However, Harold Hahn had difficulty in locating them. Both plans appeared to be adequate.

For site description see October 28, 1993 site visit. At the time of the inspection the marine rail way and way no. 1 were empty. Within the building a steel haul barge was being constructed for Taylor Industries. There was one boat moored at the dock that was damaged by fire. The internal cabin structure was being replaced.

The oil/water separator appeared to be operated properly (water was in it). Dan indicated that Troy Naccarato from Tacoma's Sewer Utility had sampled the system. The sample results indicated that the system was close to meeting the City of Tacoma's pretreatment limits. Troy suggested that they raise the pump off the bottom of the separator to ensure that sludge was not being sucked up. Harold indicated that they have raised it approximately 4 inches. They have contacted the City of Tacoma to come out and resample the system. The test results will determine if the system can meet the City's effluent limits. Dan said that if they could not meet the limits by raising the pump they would install a filter.

I explained that prior to constructing or modifying the existing system, an addendum to the engineering report and detailed plans are required to be submitted to Ecology for approval in accordance with Chapter 173-240 WAC. However, if the existing system (without filter addition), can meet the City's pretreatment limits and is issued a permit by the City of Tacoma to discharge to the sanitary sewer, then Jones-Goodell would not be required to submit an addendum to their existing report.

Harold indicated that Troy inspected the site during a storm event. Sheet flow run off did not enter the oil/water separator with the exception of one small area. This area is located near the rails that moves vessels to and from marine railway to the ways. As a result it can not be bermed, however, Jones Goodell has built up the area with soil to prevent run off from entering the oil/water separator. This area is inspected following the use of the railway.

The catch basin's storm water outfall line was evaluated as part of this inspection. It is located below the marine railway ramp in some steps that are next to the oil/water separator (see photos no. 1 & 2). The outfall line is approximately 1-inch diameter PVC pipe. It appeared to be blocked with debris and perhaps broken. Since the outfall line does not function storm water appears to pool in the gravel yard. This means that the pathway of greatest concern is water flowing through soil rather than overland.

The blasting shed is an area only draped in plastic. The floor of the blasting shed is cardboard covered by plastic. There is spent grit on the ground in front of the shed. If Jones-Goodell intends to continue sand blasting they must upgrade their shed (provide a covered designated area that is paved). Dan indicated they could not afford the cost of an upgrade, therefore, they will discontinue its use. We discussed what would be required to clean up the area.

The small wooden framed structure that is used to store cured cans of paints, resins, and gelcoat was cleaned up. All cans were located undercover.

Bilge water is disposed of by Arrow Services. Jones-Goodell also recycles precious metals (copper, aluminum, nickel, and scrap metals). Scrap metal is taken to general metals the remaining precious metals are sold to the recycler offering the highest refunds.

Not all hazardous waste containers were labeled. In addition, aisle space was not provided. The last shipment of 10 drums occurred on July 19, 1993. For additional information see Lee Bagley's attached inspection report.

RECOMMENDATIONS AND CONCLUSIONS

Housekeeping at the facility has improved. The following conclusions summarize the areas of noncompliance we observed during the Reconnaissance inspection:

1. The completed spill control and solid waste control plans should be available for employees use. Keeping it on file is okay, however, employees must be trained about these plans and be expected to perform in accordance with these practices. Copies of these plans, including emergency phone numbers, shall be posted in the work areas.
2. Currently Jones-Goodell shall not be required to submit an engineering report addendum for collection and treatment of pressure wash wastewater. This wavier shall not relieve Jones-Goodell from any other requirements the City of Tacoma may require for a pretreatment permit. Jones-Goodell shall continue to work with the Tacoma Sewer Utility to receive authorization to discharge effluent from their oil/water separator to the sanitary sewer. However, if the City does not issue you authorization to discharge to the sanitary sewer, Jones-Goodell shall notify Ecology by telephone within 24 hours. A written addendum to the existing engineering report which discuss additional treatment shall be submitted to Ecology within 30 days of the time the City of Tacoma denies your application.
3. It appears that the stormwater outfall no longer functions. Subsequent inspections by Ecology should investigate seeps along the waterfront.
4. The blasting shed should be dismantled. As discussed, spent grit could piled and covered with plastic sheeting to prevent contact with stormwater. This would be considered a temporary measure until Jones-Goodell could afford to dispose of the material.

Sandblast grit may be recycled to Portland cement manufacturing plants. Contact Western Services (206) 671-7035. Also, you may want to contact Rocky Becker, AK-WA's Environmental Hazards Manager, at (206) 272-0108. AK-WA disposes spent grit on a regular basis; perhaps you could coordinate with their disposal runs.

5. See attached inspection report for hazardous waste deficiencies.